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TECHNICAL MEMORANDUM

UTAH COAL REGULATORY PROGRAM

October 15, 2008

TO: Internal File

THRU: Steve K. Christensen, Environmental Scientist/Hydrologist *SKC*

FROM: *AAA* April A. Abate, Environmental Scientist/Hydrologist

SUBJECT: Plastic Tees, Task ID # 3032, Genwal Resources, Inc., Crandall Canyon Mine, C/015/0032

SUMMARY:

On August 14, 2008, the Division of Oil, Gas and Mining (the Division) received an application to amend the East Mountain Drillpad Reclamation Plan. Genwal Resources, Inc. (the Permittee) installed plastic tees and elbows instead of concrete tees and elbows in the seep collection systems along the United States Forest Service (USFS) and School Institutional Trust Land Administration (SITLA) road on East Mountain. In addition to utilizing plastic materials, as opposed to concrete, the Permittee deviated from the approved plan by eliminating the installation of concrete collection boxes at the seep locations.

According to an inspection report dated August 13, 2008, the Permittee indicated that installing a concrete collection box at the seep locations was not the appropriate design given the conditions in the field. According to the August 13, 2008 inspection report, Division representatives agreed with this assessment and requested that the Permittee submit a revision to the approved plan that detailed the seep collection systems as they were constructed in the field.

The amendment should be approved at this time.

TECHNICAL ANALYSIS:

OPERATION PLAN

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

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Analysis:

Plans and Drawings

The application meets the Plans and Drawing requirements of the State of Utah R645-Coal Mining Rules.

The Division approved East Mountain Drillpad Reclamation Plan (Task ID#3013) detailed the installation of a seep collection system at wet spots located adjacent to the East Mountain access road. The approved seep collection system design called for the use of concrete tees and elbows as well as a concrete collection box.

The Permittee utilized plastic materials for the tees and elbows and eliminated the concrete collection boxes. Due to the climatic conditions of the site, the Permittee felt that the collection boxes could freeze in the winter months and thus impair the ability of the system to efficiently convey water under the access road. On August 13th, 2008 Division representatives conducted a field inspection of the site and concurred with the Permittee's assessment of the collection boxes.

The Division requested that the Permittee submit as-built design drawings for the seep collection systems. Plate #1 of 1 of the submittal provides a plan, profile and cross-sectional view of the seep collection systems as they were installed at the site.

Findings:

The application meets the Plans and Drawing requirements of the State of Utah R645-Coal Mining Rules.

RECOMMENDATIONS:

The application meets the requirements of the State of Utah R645-Coal Mining Rules. The Division should approve the amendment and replace the drawing in Attachment 16 of Appendix 22 (A) of the East Mountain Drillpad Reclamation Plan.